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UNITED STATES SOUTHERN DISTRICT COURT  
EASTERN DIVISION

SHANDA MATHIS AND MINORS- M.C.; M.C; D.C.; D.C; A.C.  
PLAINTIFFS

VS

**2 : 11 cv 395**

OHIO JOB AND FAMILY SERVICES; FRANKLIN COUNTY CHILDREN  
SERVICES; OHIO YOUTH ADVOCATE PROGRAM;  
DEFENDANTS

**JUDGE FROST**

**MAGISTRATE JUDGE KING**

Now comes Shanda Mathis as Plaintiff and on the behalf of herself and minor Plaintiffs being M.C; M.C.; D.C.; D.C.; A.C.; for the violation of their Fourth and Fourteenth Amendment rights of the United States Constitution. Plaintiffs state Defendants seize (kidnapped) minor Plaintiffs under no violation of law or legal cause of action thus restraining Plaintiff free movement therefore Plaintiffs are stating that an R.I.C.O. violation can be established by Defendants premeditated conduct-(Racketeering and Influenced, Corruption Organization Acts-Under the law, **racketeering activity** means:

- Any violation of state statutes against gambling, murder, kidnapping, extortion, arson, robbery, bribery, dealing in obscene matter, or dealing in a controlled substance or listed chemical (as defined in the Controlled Substances Act);
- Any act of bribery, counterfeiting, theft, embezzlement, fraud, dealing in obscene matter, obstruction of justice, slavery, racketeering, gambling, money laundering, commission of murder-for-hire, and several other offenses covered under the Federal criminal code (Title 18); is being committed by Defendants causing Fourth Amendment violation of the United States Constitution.

Defendants conspired together under the color of official law to violate Plaintiffs Fourteenth amendment rights of the United States Constitution when Franklin County Children Services knew of Columbus Police Department violation and discrimination on July 6, 2007 where no other complaints to Franklin County Children Services about Plaintiffs was within the system.

Ohio Department Jobs and Family Services(ODJFS) discriminated and violated Plaintiffs Fourteenth Amendment Rights of the United States by denying Plaintiffs assistance when minor Plaintiffs were temporary out of the home where assistance could have helped Plaintiffs keep home and helped hardship circumstance where the assistance program is intended for needy families or families needing extra assistance.

Defendants ODJFS and Franklin county children services are under the same federal agency being United States Health and Human Services thus, monetary gains and funding causing Defendants to conspire to attain federal funds.

Defendants Ohio Youth Advocate Program committed aggravated sexual abuse of minors Plaintiffs where they were aware of Sexual violator/offender orders to stay away from minors.

Plaintiff states Franklin County Juvenile/defendants court violated Plaintiffs Fourteenth Amendment by continuing violations of Plaintiffs rights under the color of official law by stating that Plaintiff was unable to have custody of minor plaintiffs because she had no

furniture within the home even though housing items/furniture was within local storage.

Chief Judge of Franklin County Juvenile knew Plaintiffs were not homeless because an civil protect order was filed and dismissed where chief judge personally resided over case where Plaintiff lived with relative.

Defendants robbed Plaintiffs of an home and several rights thus, violating the fourteenth amendment of the United States Constitution.

Whereas, Plaintiffs are requesting and moving this court for an jury trial where Plaintiffs United States Constitutional rights were violated by Defendants. Plaintiffs request six million dollars of damages for damages-mentally and physically.

Respectfully submitted,

*Shanda Mathis*  
Shanda Mathis

Pro Se/Plaintiffs  
810 Wedgewood Dr Apt 7  
Columbus, Ohio 43228  
614-732-5327

CERTIFICATE OF SERVICE

I, Shanda Mathis, certify that an true an correct copy of this document was sent to Defendants below VIA FAX OR by first class U.S.P.S. pre paid postage mail on May 6, 2011.

OHIO JOB AND FAMILY SERVICES;  
Office of Legal and Acquisition Services  
Telephone (614) 466-4605  
FAX (614) 752-8298  
Email: [legal@odjfs.state.oh.us](mailto:legal@odjfs.state.oh.us)  
30 East Broad Street, 31st Floor  
Columbus, Ohio 43215-3414

FRANKLIN COUNTY CHILDREN SERVICES/LEGAL DEPT

**Franklin County Children Services**

Client Rights Officer

855 W. Mound Street

Columbus OH 43223

OHIO YOUTH ADVOCATE PROGRAM/LEGAL DEPT

**National Youth Advocate Program**

1303 East Main Street

Columbus, OH 43205

(614) 252-6927 - Phone

(800) 256-5001 - Toll Free

(614) 252-4367 - Fax